

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE**

Ian Lucas

Plaintiff,

v.

Vanderbilt University,

Defendant.

Case No.: 3:24-cv-00440

Re: NOTICE TO THE CLERK OF COURT

REQUEST FOR CHIEF DISTRICT JUDGE'S REVIEW OF MOTION

TO: Clerk of Court

Fred D. Thompson U.S. Courthouse and Federal Building

719 Church Street, Suite 1300

Nashville, TN 37203

Dear Clerk,

Pursuant to the Plaintiff's Motion for Sanctions and Protective Order and the lack of relevant rulings and orders by the Court to date on this matter, I, Ian H. Lucas, hereby formally request that the Office of the Clerk bring this matter to the immediate attention of the Honorable Chief District Judge William L. Campbell, Jr. for review. This motion specifically addresses the misconduct by the opposing party, which forms the basis for our request for sanctions, as authorized under Federal Rule of Civil Procedure 11(c) and the Court's inherent power to impose sanctions for litigation misconduct. Rule 11 of the Federal Rules of Civil Procedure, which authorizes the imposition of sanctions for the identified misconduct.

This motion addresses critical issues regarding the improper submission of confidential and private information into public records by the opposing party. We are seeking monetary sanctions against the opposing party their misconduct, as well as a protective order to prevent further disclosure of confidential information these concerns necessitates a review by the Chief Judge to avoid potential prejudice and ensure the proper administration of justice and protect the rights and interests of the Plaintiff.

Given the importance of the motion, which includes matters of disqualification and substantial evidence supporting the Plaintiff's claims, it is imperative that the Chief Judge's oversight be solicited at this juncture. I hereby affirm that prior to filing this motion, I complied with the 21-day safe harbor provision required by Federal Rule of Civil Procedure 11(c)(2) by serving a copy of this motion on the opposing party on approximately June 7th, 2024, allowing them an opportunity to withdraw or correct the challenged paper, claim, defense, contention, or denial. Despite this opportunity, the opposing party has not taken any corrective action, necessitating this formal filing. I have made reasonable efforts to resolve these issues with the opposing party through a video meeting on several occasions where this issue was addressed and noted by the opposing counsel. However, the opposing party has made no effort to reach a satisfactory resolution or address the matter.

I hereby certify that this motion is not being presented for any improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation. And further the motion has been properly served on all parties to the action, in accordance with court rules.

Thank you for your prompt assistance in this matter. Please proceed as necessary to facilitate the review by the Chief Judge and inform me of any additional requirements or next steps.

Respectfully submitted,

/s/ Ian Lucas

Ian Lucas
Plaintiff *Pro Se*
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Date Entered via CM/ECF: July 25th, 2024

CERTIFICATE OF SERVICE

I hereby certify that on this 25th day of July 2024, a true and correct copy of the foregoing

NOTICE TO THE CLERK OF COURT REQUEST FOR CHIEF DISTRICT JUDGE'S

REVIEW OF MOTION was served via FedEx to:

TO: Clerk of the Supreme Court
FOR: Circuit Justice Brett Kavanaugh
Supreme Court of the United States
1 First Street, NE
Washington, DC 20543

AND

TO: Chief Judge of the Sixth Circuit
United States Court of Appeals for the Sixth Circuit
540 Potter Stewart U.S. Courthouse
100 East Fifth Street
Cincinnati, OH 45202

AND

TO: Circuit Executive
United States Court of Appeals for the Sixth Circuit
540 Potter Stewart U.S. Courthouse
100 East Fifth Street
Cincinnati, OH 45202

and by CE/ECF to counsel of record Kevin C. Klein.

This document is respectfully submitted to the United States Court of Appeals for the Sixth Circuit,

/s/ Ian Lucas

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